

ESTTA Tracking number: **ESTTA770417**

Filing date: **09/13/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221978
Party	Plaintiff LT Overseas North America, Inc.
Correspondence Address	STEVEN J NATAUPSKY KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@knobbe.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Nicole Rossi Townes
Filer's e-mail	efiling@knobbe.com
Signature	/Nicole R. Townes/
Date	09/13/2016
Attachments	Stipulated Motion to Extend Dates LTFOO.060M.pdf(32750 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

LT Overseas North America, Inc.,)	Opposition No.: 91221978
)	
Opposer,)	Mark: ROYAL GREENLAND
)	
v.)	
)	
Royal Greenland A/S,)	
)	
Applicant.)	

STIPULATED MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

LT Overseas North America, Inc. ("Opposer") hereby requests that the Trademark Trial and Appeal Board (the "Board") further extend all dates in the above-referenced opposition proceeding by thirty (30) days pending the parties' settlement discussions. The parties conducted the settlement/discovery conference on January 26, 2016.

Specifically, the following deadlines would apply:

Initial Disclosures Due :	10/22/2016
Expert Disclosure Due :	02/19/2017
Discovery Closes :	03/21/2017
Plaintiff's Pretrial Disclosures :	05/05/2017
Plaintiff's 30-day Trial Period Ends :	06/19/2017
Defendant/ Counterclaim Plaintiff's Pretrial Disclosures :	07/04/2017
30-day testimony period for defendant and plaintiff in the counterclaim to close :	08/18/2017
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	09/02/2017
30-day testimony period for defendant in the counterclaim and rebuttal testimony for plaintiff to close :	10/02/2017
Counterclaim Plaintiff's Rebuttal Disclosures Due :	11/01/2017
15-day rebuttal period for plaintiff in the counterclaim to Close:	11/16/2017
Brief for plaintiff due:	01/30/2018
Brief for defendant and plaintiff in the counterclaim due:	03/01/2018

Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due:	04/01/2018
Reply brief, if any, for plaintiff in the counterclaim due:	04/15/2018

The grounds for this request are as follows:


- *Parties are engaged in settlement discussions*

LT Overseas North America, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: September 13, 2016

By: 
 Steven J. Nataupsky
 Nicole Rossi Townes
 2040 Main Street
 Fourteenth Floor
 Irvine, CA 92614
 (949) 760-0404
efiling@knobbe.com
 Attorneys for Opposer,
 LT Overseas North America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **STIPULATED MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING** upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid, on September 13, 2016, addressed as follows:

Bassam N. Ibrahim
Buchanan Ingersoll & Rooney PC
1737 King Street, Suite 500
Alexandria, VA 22314



Sarah Beno Couvillion